

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:15CR00445
	:	
Plaintiff,	:	
	:	JUDGE CHRISTOPHER A. BOYKO
vs.	:	
	:	
TAMELA M. LEE,	:	<u>UNOPPOSED MOTION TO</u>
	:	<u>CONTINUE TRIAL DOCUMENT</u>
	:	<u>DEADLINES</u>
Defendant.	:	

Defendant, Tamela M. Lee, through counsel, respectfully moves this Honorable Court for a continuance of all trial-related document deadlines. Additional time is requested because counsel has until January 20, 2017, within which to negotiate a plea. Undersigned counsel therefore request an additional two weeks within which to prepare and file the trial-related documents.

The ends of justice served by granting this motion outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C. §3161(h)(7)(A). The Assistant United States Attorneys representing the government in this matter have indicated that they do not oppose this request. Therefore, counsel for the defendant move this Court to continue the trial-related document deadlines.

Respectfully submitted,

/s/Darin Thompson

DARIN THOMPSON (#0067093)

Assistant Federal Public Defender

TIMOTHY IVEY (#0039246)

Assistant Federal Public Defender

CLAIRE C. CURTIS (#0082335)
Attorney at Law
1660 West Second Street, Suite 750
Cleveland, Ohio 44113
(216) 522-4856
Fax: (216) 522-4321
darin_thompson@fd.org
timothy_ivey@fd.org
claire_curtis@fd.org

Counsel for Tamela Lee

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2017, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by email. Parties may access this filing through the Court's system.

/s/Darin Thompson

DARIN THOMPSON (#0067093)

Assistant Federal Public Defender